

AFFIDAVIT OF GERALD ARMSTRONG

3-19-86

I, Gerald Armstrong, hereby swear under the pains and penalties of perjury as follows:

1. I became involved with Scientology in 1969 in British Columbia, Canada. In Los Angeles, California in 1971, I joined Scientology's Sea Organization, then the group of the most "elite" of Scientologists who worked directly for L. Ron Hubbard. The Sea Org was then promoted as "Ron's personal org." I remained in the Sea Org until December 1981.

2. Within a week of joining the Sea Org, I was ordered to the "Apollo" or "Flag," the flagship of the organization, then in Tangiers, Morocco. I remained on board, except for a few missions (specific operations or programs given to a group of individuals sent by the Sea Org Operations Bureau to carry out) ashore, until September 1975. Throughout 1972 and 1973, I was the ship's "legal" representative, responsible for dealings with immigration, the port authorities, customs, police, shipping agents, and ship and crew documents. In 1974, I held ship public relations positions and was responsible for promoting the ship and our activities aboard to the local people in the ports we visited. In late 1974, I became the ship's intelligence officer, a position I held until I left the "Apollo."

3. In the fall of 1975, I transferred from the "Apollo" to a land base being established in Florida. Eventually all the crew and students came ashore to Florida, leaving only a skeleton crew on board to sell the vessel. A temporary base or staging area was set up in Daytona Beach. I worked in Daytona Beach in the intelligence bureau in the Guardian's Office (GO). The GO then contained 4 major bureaux: Intelligence, Public Relations, Legal and Finance. It was the semi-autonomous militant branch of Scientology, all powerful in all organizations. The head of the GO, under L. Ron Hubbard, was his wife, Mary Sue Hubbard.

4. At the beginning of December 1975, I was sent on a mission to set up a communications unit for L. Ron Hubbard in Dunedin, Florida about six (6) miles from Clearwater where the permanent Flag Land Base was then being established. I worked in Hubbard's communications unit in Dunedin until the end of May 1976, when I travelled to Culver City, California to set up another communications unit for Hubbard.

5. In Culver City, because I got into an argument with Mary Sue Hubbard's Communicator (secretary), Hubbard deemed me a "security risk" and had me removed from the property by the US head of GO intelligence, Dick Wiegand. Hubbard had me locked up and guarded for three (3) weeks in the Scientology intelligence

office in Los Angeles. At the end of that time, he ordered me and my wife, Terri, back to Florida, to the Clearwater base.

6. In Clearwater, a telex from Hubbard awaited Terri and me ordering us into the Rehabilitation Project Force (RPF), a virtual prison Hubbard had created for any Sea Org members whom he considered were in violation of or "counter-intention" (CI) to his orders or policies. I spent from July 1, 1976 through December 1, 1977 in the RPF, a total of 17 months. During about a year of my sentence, I was, within the RPF, in charge of it, including all but the last few days the plaintiff, Tonja Burden, spent in the RPF.

7. Shortly after "graduating" from the RPF, I transferred with Terri to the Commodore's Messenger Organization (CMO) unit in Los Angeles. The CMO, in which I was never formally posted, was the Sea Org Unit, comprised mainly of girls and young women who ran messages for the Commodore, L. Ron Hubbard. They were his agents, and their orders had to be obeyed as if they were his. In Los Angeles, I was ordered to retrieve Ms. Burden, from her parents' home in Las Vegas after she escaped from the RPF in Clearwater in mid-December 1977.

8. At the end of December, Terri and I transferred to Hubbard's secret base in La Quinta, California. Hubbard, who had been in hiding in Sparks, Nevada, following and as a result

of the FBI raid on Scientology's intelligence offices in July 1977, arrived back at the La Quinta property at the same time. It had been determined that Hubbard would not be indicted in the Federal criminal case the Government brought against the GO hierarchy for burglaries, theft, and obstruction of justice, and it was therefore safe for him to return to La Quinta, although he still took various security precautions even there. Mary Sue Hubbard, the Controller and head of the GO, and, under Hubbard, in charge of all of Scientology internationally, had been indicted in the Federal criminal case, and she left the La Quinta property within a day or two of his return.

9. At La Quinta, I was primarily involved in film production. Hubbard had written some scripts for Scientology "training" or promotional films and the La Quinta crew, which grew from around 80 to over 150 in 1978, formed the production crew and actors pool. Hubbard ran every aspect of the film-making and personally directed the actors and technical crew on the set. I worked in sets, lighting, the camera unit, was the location scout, and for a brief time, until Hubbard busted me, was in charge of the whole shoot crew as the cine crew chief. I also was, throughout the first few months of 1978, a night guard every second night outside Hubbard's house on the property.

10. Around September 1978, Hubbard again assigned me

to the RPF, this time in a unit which he had established on the La Quinta properties. This assignment was because Hubbard thought I had joked about training drills he had ordered for the shoot crew. On this occasion, I spent 8 more months in the RPF until I was able to get reprieved. The La Quinta RPF mainly worked on renovations and improvements to Hubbard's home: tiling his floors, painting, cleaning and reinsulating the ducting, carpeting, and brickwork for his walkways.

11. Because of his fear that the cover or "shore story" for the La Quinta property was going to be blown ("shore stories" will be dealt with later in this affidavit), Hubbard ordered in the fall of 1978, the purchase of another property, a 550 acre golf course and motel complex at Gilman Hotsprings near Hemet, California. The RPF transferred at the beginning of December to Gilman and began the renovations and decoration of a home and offices for Hubbard on the property. After reprieve from the RPF in the spring of 1979, I continued to work on the renovations project, and by the summer I became the LRH Renovations In-Charge and the head of Hubbard's Household Unit at Gilman. Under me organizationally were Hubbard's steward, carpenter, groundsman, electrician and the LRH Gear In-charge who was responsible for her personal belongings stored on the Gilman property.

12. Although we completed the renovation of his home

and offices according to his instructions, and although he many times indicated his intention to reside there, Hubbard never, to my knowledge, slept on the property. He came there several times in 1979 under very tight security which, while he was at Gilman, I was responsible for. He came to supervise photographic promotional work a number of times, and he came several times to meet with Mary Sue Hubbard at their house. They arrived separately at an appointed time from different locations, and left separately after their meetings. Throughout 1979 Hubbard lived in an apartment complex in Hemet with 10 or so Sea Org staff. This location was kept secret even from the majority of personnel at Gilman, and those of us who did know referred to it only as "x."

✓ 13. At the beginning of 1980, a possible raid by the FBI on other law enforcement agency was announced by the CMO at Gilman. In anticipation of this raid, which never occurred, everyone on the property was ordered to destroy anything which showed that Hubbard controlled Scientology, that he controlled bank accounts, that he had been ordering staff at Gilman anywhere to do anything, that he had even been to Gilman, that he intended to reside at Gilman, and anything which showed him in a bad light. Each person was required to go through every paper in his area and destroy any evidence of these facts. A commercial shredder was rented and operated day and night for two weeks. Hundreds of thousands of pages were destroyed; the

✓ L shredded paper taken off the property in large trucks.

14. In the middle of this shredding operation, my junior, the LRH Gear I/C came to me with a box of papers from Hubbard's storage and asked if they should be shredded. I looked through them and found they were very old letters, diaries and other papers predating 1950 when Hubbard had begun to build the Dianetics and Scientology organizations. I determined these papers should have no evidentiary value to any law enforcement agency who might raid the property, but had historical value, so I moved them to Hubbard's Personal Public Relations Bureau, then headed by his PRO Laurel Sullivan. I then went into Hubbard's storage and found several more boxes of similar materials.

15. Having worked in PR and Intelligence on the ship and been on Hubbard's personal staff for some time, I was aware of many of the disparaging claims the press and other "enemies" of Hubbard were making about his past, and I felt that with these newly found papers, which even Hubbard's Personal PRO did not know existed, we could document the truth about him for the first time and put an end to the attacks on him, which he continuously stated, were lies. I therefore, sent a petition^{Exhibit A} to Hubbard to gather up all his papers, create an archive, and provide the documentation to a writer to do a major, authoritative biography about his life which would prove through

solid documentation that his critics were lying. He approved the petition and I transferred to his Personal PRO Bureau and began assembling biographical materials from the Gilman storage, and eventually, from many other sources. A copy of his approval is attached hereto as Exhibit B.

16. I wrote to Hubbard about the materials I had discovered and the biography project a few more times in the first two months of 1980. One of his replies to me, in this case to my delineation of what I was doing and a request from him of what he personally needed and wanted from me, is attached as Exhibit C. Shortly after this, because of his fear that he would be served with a summons or subpoena in any of the lawsuits then being brought by former Scientologists who felt they had been damaged by the organization, Hubbard left "x," and went into deeper hiding with two of his messengers, Pat and Anne Broeker. One of these former Scientologists known at that time to be speaking out against Hubbard's practices and organization conditions was Tonja Burden. I knew about these legal matters because in February of 1980 I was ordered along with Laurel Sullivan, onto a mission, entitled Mission Corporate Category Sortout (MCCS), the purpose of which was to work out a corporate strategy to let Hubbard continue to control the various Scientology organizations, but shield him from legal accountability.

17. Because of attempts to serve Hubbard in several lawsuits, I was instructed by Laurel Sullivan that we could not admit that communications could be gotten to him from the Scientology organizations. I knew this was not true and that he was in continual communication with the organization via David Miscavige, one of his messengers. I received a message myself some months after Hubbard "disappeared," to send him a copy of one of his manuscripts that I had found, and I was able to send it from Laurel to Miscavige to Hubbard. I also knew that Pat Broeker, who was with Hubbard, could be contacted and arrive in the Los Angeles area in a matter of three hours. Nevertheless, because the communication line to Hubbard could not be acknowledged, I did not report to him again about the biography project. I did report to Mary Sue Hubbard a number of times throughout 1980 and 1981 and received from her replies to my reports. One of her replies is attached hereto as Exhibit D. I also obtained a letter of introduction, a copy of which is attached hereto as Exhibit E, from Hubbard's Personal Secretary, Pat Brice to assist me in conducting interviews of Hubbard's relatives.

18. Throughout 1980 and 1981, I assembled an archives of something like 500,000 pages of documentation about the life, writings, and accomplishments of L. Ron Hubbard. A chart showing some of the sources of this Biography Archives is attached as Exhibit F. In October 1980, Hubbard using a Danish

publishing company, actually run by the Guardian's Office under him, contracted with a non-Scientology author, Omar V. Garrison, to write his biography. Pursuant to this contract, I provided Garrison with approximately 100,000 pages of biographical research materials and assisted him with arranging interviews with Hubbard's family members and early friends or associates, getting him needed supplies, and answering his many questions as possible.

19. Through the course of my research from many documentary sources I was able to determine the facts behind most of the significant representations that Hubbard made about himself, or which he had ordered his public relations staff, the GO, recruiters, and sales personnel make about him. Attached as Exhibits G, H, and I are biographical materials written by Hubbard and published and disseminated by Scientology organizations. They were used for public relations, recruitment or sales purposes. I was myself brought into Scientology and the Sea Organization, and kept in the Sea Org for almost eleven years, by the representations made in these materials and others like them.

20. Exhibit G, entitled "L. Ron Hubbard," was published widely in Scientology magazines, and books from the late 1960's throughout the 70's. It contains several claims about Hubbard which deeply impressed me when I was being brought

into Scientology.

W.B.

- A. That he was in China when he was fourteen, spent the next several years in travel throughout Asia, and studied with lama priests in China and India;
- B. That he graduated in mathematics and engineering at George Washington University; and then became a member of the first US course in nuclear physics;
- C. That he was crippled and blind at the end of the war and fully cured himself with his discoveries;
- D. That it was a matter of medical record that he had twice been pronounced dead.

21. Exhibit H entitled "A Brief Biography of L. Ron Hubbard" was widely circulated in the 1960's and 1970's. It contains many of the representations which influenced me to become involved in Scientology and to work for Hubbard; some were the same or similar to those in Exhibit G.

- A. That he earned a bachelor of science degree from George Washington University in civil engineering;
- B. That he spent several years in travel

throughout Asia from the age of fourteen, and studied with lama priests in China and India;

C. That he attended the Princeton School of Government, and obtained a Ph.D. from Sequoia University;

D. That he excelled in his subjects at university;

E. That he was the character, and had the adventures of "Mr. Roberts," after whom the movie was made;

F. That Scientology is an organized body of scientific research knowledge about life and the mind;

G. That Dianetics and Scientology can raise IQ about one point per hour of processing (auditing). Also that skill and efficiency can be raised. The raises can be tested by very severe regimens and can be found to be stable.

22. Exhibit I, is a policy written by Hubbard entitled "PE Handout." PE or Personal Efficiency Course is an introductory course to get people into Scientology. The policy contains an article entitled "What is Scientology?" which per the policy was to be reprinted separately and was required to be given to new people brought in. The policy was reprinted republished and copyrighted into the 1980's. I used this material myself when trying to sell people Scientology in 1970.

It contains numerous representations about Hubbard and Scientology which sold me on the man and the subject.

- A. That Hubbard was a civil engineer (CE);
- B. That he was a doctor of philosophy (Ph.D.);
- C. That he was a nuclear physicist;
- D. That he was educated in advanced physics and higher mathematics;
- E. That he was a student of Sigmund Freud;
- F. That Scientology was the first major and complete breakthrough by the exact sciences into the field of the humanities;
- G. That Scientology is the only successfully validated psychotherapy in the world;
- H. That it is a precision science;
- I. That its results are easily demonstrated claims that can be duplicated by competent practitioners at will;
- J. That it is the first science to prove that IQ and intelligence can be improved and are not inherent in a person;
- K. That it is the first mental science to subject itself to the most severe validation tests;
- L. That is it the first science to make whole classes of backward children averagely bright;
- M. That it is the first science to determine the

basic cause of disease.

23. Hubbard promoted himself in much the same way outside of Scientology. Attached hereto as Exhibit J is a copy of Hubbard's autobiographical submission in 1967 to "Who's Who in California." Again, he claims to have a bachelor of science degree in civil engineering from George Washington University in 1934, a doctor of philosophy degree from Sequoia University, and to have served in five theatres in World War II, commanded escort vessels from 1941 to 1946, and been awarded 21 medals and palms. (Palms are small representations of a palm leaf added to a military decoration awarded a second time.)

24. My research throughout 1980 and 1981, however, revealed a very different, and to me shocking picture of Hubbard, his past, credentials, accomplishments and Scientology.

N.B.

- A. He had not graduated in mathematics, nor was he educated in higher mathematics;
- B. He was not educated in advanced physics;
- C. He did not obtain a bachelor or science degree;
- D. He was not a civil engineer;
- E. He was not a nuclear physicist;
- F. He was not a member of the first US course in nuclear physics;
- G. He did not excel in his subjects at university;

W.B. { H. He attended George Washington University two years, 1931 and 1932. He was placed on probation after the first year, and in the second year his grades deteriorated. He failed both his mathematics courses his first year and got D's when he repeated them the second year. The one course he took in molecular and atomic physics he failed. He did not return to George Washington University thereafter. (A copy of his academic transcript, which I had in the biography archives, is attached hereto as Exhibit K);

I. Hubbard did not pursue post-graduate studies at Princeton;

J. During the war, he attended a less than four month course in military government which was given by the Navy on the Princeton campus.

K. His Ph.D. was from a "diploma mill" and was arranged for him, on his insistence, by early Dianeticists.

L. He was never a student of Sigmund Freud (unless reading something written by Freud made him a "student," in which case most of the literate world is to some degree).

25. I had diaries Hubbard kept of his time spent in Asia and correspondence between him and his parents and

associates from the period, and was able to determine fairly accurately the truth behind his claims about this period.

NB.

- A. He was not in China at fourteen and did not spend several years travelling throughout Asia;
- B. He did not study with lama priests;
- C. He was never in India;
- D. He attended school in the United States during the years from 14 through 18;
- E. Hubbard's father, who was a naval officer, was stationed on Guam, and Hubbard travelled twice by ship to Guam to the US and back, one in 1927 and once in 1928. On those trips the ships stopped briefly at various Asiatic ports in Japan, China, Hong Kong and the Philippines. The only time Hubbard travelled into the interior of China was on a tour sponsored by the YMCA given to children of US service personnel stationed in the Pacific. His total time in Asia was a few weeks.

26. I amassed approximately two thousand pages of documentation concerning Hubbard's wartime career: what he was doing, what vessels he was on, fitness reports and medical and VA disability records. The truth is far different from the public representations.

- W.B.
- A. He was not crippled nor blinded during the war;
 - B. He did not cure himself with his discoveries;
 - C. He was not "Mr. Roberts";
 - D. He did not command escort vessels from 1941 to 1946;
 - E. He was not awarded 21 medals and palms;
 - F. At the beginning of World War II, Hubbard was assigned to Naval Intelligence in Australia. He was there briefly until ordered back to the U.S. as unsatisfactory for the duty, and after his return was transferred out of Intelligence. He had command of two vessels: the first for a month during refit; the second for two and a half months during outfitting and shakedown. He was removed from command of the first for exceeding orders, and from command of the second when he fired the ships' guns in Mexican waters causing an international incident. In a diary he kept through part of the war he revealed that he had had his men lie for him in the Naval Board of Investigation convened to investigate the incident. He claimed to have sunk two Japanese submarines during the shakedown cruise during his second command, but the Commander of the Northwest Sea Frontier, Admiral Fletcher stated in a report, attached hereto as Exhibit L, that "an analysis of all reports convinces me that there was

W B.

no submarine in the area." Hubbard spent the last few months of the war in a naval hospital with a duodenal ulcer. He was awarded four standard medals for his wartime service. A copy of a letter from the Department of the Navy listing his naval assignments and medals is attached as Exhibit M. At war's end he was awarded a ten percent disability for the ulcer. In 1946, he appealed the disability award, claiming in addition to ulcers to have "conjunctivitis" or inflammation of the eyes, and an infection in the hip joint contracted as a result of his transition from the tropics to the eastern winter cold. In October 1947 he wrote to the Veteran's Administration asking for psychiatric treatment stating "I cannot account for no rise above long periods of moroseness and suicidal inclinations." In December 1947 at a VA examination he claimed injuries from 1942 from falling off a ladder. In 1948 he was able to get his disability award increased to forty percent for the duodenal ulcer, infection of the eyes, bursitis of the right shoulder and arthritis of multiple joints. In a handwritten document from this period, Hubbard reveals the truth behind his disability claims. He stated: "Your stomach trouble you used as an excuse to keep the navy from

NB. { punishing you....Your hip is a pose....Your foot was an alibi....When you tell people you are ill, it has no effect upon your health. And in the Veterans' Administration examination you'll tell them how sick you are; you'll look sick when you take it; you'll return to health one hour after the examination and laugh at them. No matter what lies you may tell others, they have no physical effect on you of any kind." The transcript where this was read into the record in the case of Church of Scientology of California v. Armstrong, in Los Angeles, California is attached hereto as Exhibit N. In July and August 1951 Hubbard attended another set of VA medical examinations and complained of the same conditions for which he was receiving a disability pension (and which he would claim in his Dianetics and Scientology promotional literature he had already cured himself of). Attached hereto as Exhibit O are copies of Hubbard's physical examination results, VA reports, and related documents from the period 1941 to 1951. Attached as Exhibit P is a letter from the VA stating Hubbard was still receiving the 40% disability compensation in 1973. Exhibit Q, correspondence between various individuals in the GO, including Mary Sue Hubbard, show that the

organization and Mrs. Hubbard possessed L. Ron Hubbard's naval documents at least by 1976.

27. As the wide gap between Hubbard's claims about himself and the reality evidenced by the documentation I had assembled became manifest, I attempted to get the public relations and promotion executives on his staff or in organization positions to change the biographical materials being published and disseminated about the man. I critiqued a number of these biographical sketches, about-the-author sections of books, and promotional pieces, pointing out what I knew to be false misleading, unverifiable or hyperbole. One of these "critiques" written to Barbara DeCelle, then the person in charge of republication of Hubbard's works to make more income for him, is attached hereto as Exhibit R. One of the reasons I had gotten into Scientology had been the promise of truth, honesty, and a higher level of ethics, and I considered, when the falsehoods became obvious to me, that we, organizationally, had to correct them and strip them from the literature.

28. In November 1981, when word of my attempts to correct Hubbard's misrepresentations reached the little group of messengers then running the organization for him and attempting to extricate him from all his legal problems, one of them, Norman Starkey, ordered in response that I be sec checked. By this time I also knew the truth about sec checking, or security

checking: that it is a brutally accusative interrogation in which the E-Meter, the electrometer used in Scientology auditing or therapy, is employed as a lie detector. The grilling can go on for hours. The purposes are to intimidate and break the subject, and get from him details later usable by intelligence or security personnel against him. It has nothing to do with therapy or helping anyone. A few days after learning of Starkey's order that I be sec checked, I decided to leave the organization. Before that, I sent a report, a copy of which is attached hereto as Exhibit S, to Cirrus Slevin in the CMO, the person to whom Starkey's report about me had gone. In my report, I again pointed out a number of falsehoods Hubbard had written about himself, and indicated why I had been seeking to have them corrected. By December 1981, I knew that Hubbard would never allow the lies to be expunged from his writings and could never himself face the truth, and on December 12, along with my wife, Jocelyn, I left.

29. Toward the end of my time in the Sea Org, because of my study of the archives materials, I began to perceive that I had been drawn into Scientology and the Sea Org and kept there by a web of lies, by Machiavellian mental control techniques, and by a terrible fear generated by Hubbard and his organization. After I left and was able to distance myself somewhat from the oppressive environment of the Sea Org, and to integrate to some degree, albeit with great difficulty, back

into society, the picture of what the organization actually was and did and had done to me, became clearer and clearer. That I had been defrauded out of money and twelve and a half years of my life, and that I had been abused and my civil rights trampled was obvious. I was broke, broken and confused; nevertheless, I did not wish to attack Hubbard or the organization. I was willing to live and let live. Only when it became clear that I would not be allowed to get on with my life, when I became, right after leaving, a target of organization intelligence operations, and a Black Propaganda campaign to destroy my reputation, and when Hubbard's agents stole a set of valuable photographs from me, did I take a stand against the abusive and criminal practices of his organization. I had become "Fair Game," meaning according to Hubbard's policy by the same name, that I could "be deprived of property or injured by any means by any Scientologist without any discipline of the Scientologist. May be tricked, sued or lied to or destroyed." Scientology has claimed that the policy had been cancelled, but I knew from first hand knowledge that it had not. And what I had done to have this brutal policy inflicted upon me was to do my research work too well, to learn too much, and to try to make known what I had found to improve organization conditions.

30. An important aspect of Sea Org life, and a factor in controlling personnel and keeping them inside and cut off from the outside is the use of "shore stories," the name Hubbard

gave to cover stories or guises. Before I was sent to the "Apollo" from Los Angeles at the beginning of 1971, I was briefed and drilled on the shore story I was to use enroute. I was to be an employee of Operation and Transport Corporation, Limited (OTC), a buisness management company. I could not use any Scientology words on the trip and was to deny being a Scientologist. On the "Apollo" I was given a pack of materials about the ship and OTC to study and was examined and drilled on these materials, and had to be able to field questions thrown at me by the Port Captin, the officer responsible for getting the shore story believed by the local people, before I was allowed to go ashore. I had to deny any connection between OTC and Scientology. I had to feign ignorance of L. Ron Hubbard's position on board or his control of the operation, and if possible even that he was aboard. I was not to divulge what my pay was if asked but was to offer an evasive answer like "the pay is really good." If asked about religion I was to think back to the religion I had been raised in and answer something about that.

31. When I became the ship's "legal" representative, then Port Captain, and finally intelligence officer, I personally briefed and drilled hundreds of people on the OTC story and other shore stories. Foreign personnel being sent into the U.S. on a mission I briefed and drilled on a cover to explain the various stamps in the passports, then sent them to a

consulate or embassy in a country the ship didn't visit to obtain a "visitor's visa." This was in flagrant violation of immigration laws because the people were in fact going to the U.S. to work, and their statements about what they had been doing up to then were false.

32. Another shore story was projected to get around maritime regulations. The ship could not pass the requirements set by the International Convention for Safety of Life at Sea (SOLAS) for passenger vessels, so Hubbard labelled her a "yacht." By law, however, a yacht could have only a small maximum number of passengers; that is, people paying for their passage and not actually performing crew functions, and we had several times the allowable limit. People coming to the ship for courses or auditing paid to be on board and were not crew. To circumvent passenger vessel regulations, however, we had these people sign the ship's articles as crew, and they were given ship positions on the crew list and issued fake seamen's books. The maritime authorities in several ports questioned the ship's status and our non-compliance with SOLAS requirements and these authorities were "handled" with the "yacht" story and bogus inspections we had done to make it look like we exceeded safety requirements by having a "SOLAS inspection" done although not required to. The fact was the ship was grossly overcrowded with nowhere near enough lifeboat capacity for the complement, which from 1971 through 1975 averaged over 400 people, and most

of the lifeboats themselves were unseaworthy. She was overladen with her Plimsoll or load line completely under water. She was not insured, and in fact, because of her condition, could not be insured. But all of these facts were hidden from the authorities and crew and passengers alike.

33. Even to our families and friends back home, and between ourselves there were shore stories. As soon as I came on board I was briefed that the ship's location, any of the activities and conditions on board, and any difficulties I might be having could not be revealed in any letters. Mail was left unsealed and was read by the Master-at-Arms (MAA) or ethics officer, the person responsible for discipline and punishment, before it was sent off the ship to later be posted from Denmark. If anyone left the ship for any reason, to go on a mission or on leave, his baggage was first inspected by the MAA, or any the gangway guard or quartermaster (QM) and anything which would reveal the ship's location, like clothing labels, cigarettes or toiletries from the countries we visited was removed.

34. There was constant attention to "security" on board, not physical safety, but the "enemy" finding out what we were up to. Any breach of security was dealt with in the harshest way. Every person on board was urged to report anyone else who violated security rules, or any other rule for that

matter. Scientology words could not be used ashore, nor could Scientology literature be visible to local people at any time. If local people ever came on board, or inspections done for any reason, a "clean ship drill" was called and all crew knew to hide any Scientology materials from view. Paper trash was never thrown out in the garbage, but saved until it could be dumped at sea when the ship sailed between ports. No one was allowed off the ship without permission, and there was always a "restricted list" of persons specifically not allowed ashore kept by the gangway QM. Anyone who was considered a security risk, who wanted to leave the Sea Org, or who for any reason was assigned a "lower condition," or "ethics penalty," which at any time could be dozens of crew or students, was restricted to the ship. If a gangway QM allowed ashore anyone without permission, particularly anyone on the "restricted list," the QM would be assigned a lower condition for breach of security. By Hubbard's policy, security violation was assigned "treason," one of the lowest conditions, which carried with it other punishment including loss of "pay," and twenty-five or more hours of "amends," work to be done in addition to the work of one's own job.

35. Although people who resisted Hubbard's policies, or who became seriously ill and unable to work, or who were labelled "deadwood" were from time to time offloaded, meaning they were kicked off the ship or out of the Sea Org, when people

N.B. { asked to leave they were not allowed to. They were assigned a "lower condition," usually "doubt," and subjected to lengthy sec checks. Usually they were guarded and sometimes locked up. Anyone who announced he wanted to leave was considered "psychotic" and treated as such. He was labelled a "suppressive person," meaning in Hubbard's "mental technology" that he was one of the 2½% most evil people in the world and "destructively antisocial." Although people finally did leave the ship if they persisted in their demand to go, it was only after they had been thoroughly sec checked, signed waivers, bonds, releases, lists of their "crimes" excerpted from their auditing files, and promissory notes for all the auditing and courses they had taken while in the Sea Org. From time to time individuals being held on board would "blow," meaning escape, and jump ship and attempt to get away. Usually they were brought back before they could complete their getaway. Everyone's passport was kept locked up on board by the ship's representative so it was extremely difficult for anyone who did manage to get off the ship to get back home as he would have no travel documents. Such people, if desperate enough, would make their way to a consulate and attempt to have a new passport issued. Knowing this we staked out the consulate the person was likely to go to and were usually able to retrieve them before they approached any consulate officials. I was involved in numerous such recoverings of "blown" crew or students. If the person got to the consulate and told his story it was considered a serious "shore flap" or

NB { danger to security, as the facts that he had been held against his will and refused his own passport would emerge. In that event, we would carry out a "dead agent caper" against the "blown" person. The "dead agent caper" meant to "counter-document" anything derogatory someone (it originally applied to enemy "agents") was saying about you so that the person is not believed and as an "agent," is "dead." The person who went to the consulate would be "dead agented" or "DAed" with a story that he had stolen money or been a troublemaker or similar so that his story about conditions on board would not be believed. There were a number of such occurrences while I was on the Apollo working in the Port Captain's office.

36. The idea that there were enemies of Scientology, that these enemies were "suppressives" who sought to destroy anything which helped mankind, and that these enemies dealt in lies about Hubbard and Scientology which had to be "dead agented" was something which permeated all of Scientology but was, at Flag, at the top of the Sea Org, a constant awareness. Hubbard wrote continually about "the enemy," the "war" we were fighting, the need for vigilance, dedication and sacrifice. Psychiatrists, psychologists, doctors, international bankers, intelligence agencies, Internal Revenue Service, the press, government, consular officials and later even scientists: these were the "enemy." these were "suppressive persons." He wrote that they drugged and hypnotized people and sent them into

organizations to then pretend to go insane with Scientology treatment or that they were sent in to spy on our activities. We were continually warned to be aware of infiltrators or "plants," and from time to time "plant checks," special sec checks to locate plants were done on staff. This group of "enemies" Hubbard stated were the "merchants of chaos," profiting from the illness and insanity they created. The "enemy" was a multibillion dollar conspiracy , and we, with the only workable mental technology on the planet, were the last hope mankind had. This "enemy" and the threat to everyone was what we all were told necessitated the tight security and the severe discipline, and was in part why I at least tolerated the miserable conditions. Through time, however, Hubbard's perceived "enemies" more and more became people close to him, staff members, people who had been completely dedicated to him for years. Purges occurred and these dedicated people were themselves labelled "suppressive."

37. Out of his fear of the "enemy," Hubbard created in 1966 the Guardian's Office (GO), and headed it with his wife, Mary Sue. Three years later, after the creation of the Sea Org, Mary Sue became the Controller, and Jane Kember became the Guardian under her. The operational headquarters of the GO was "Worldwide" (GOWW) located at Hubbard's former home in East Grinstead, Sussex, England. Under WW was the "United States Guardian's Office (USGO), responsible for GO activities in the

United States. Each Scienotlogy organization had attached to it a local GO, which reported to the "continental" GO, which reported to GOWW, which in turn reported to the Controller and finally Hubbard. The GO was semi-autonomous in that it did not follow normal organization lines and operated on its own secret policies called Guardian Orders, Guardian Program Orders, Guardian Finance Orders and other GO internal issue types. The GO was all-powerful in every organization except where its activities would counter Hubbard's explicit orders. He operated the GO via his wife, much as he operated the Sea Org via his messengers and personal aides. Within the GO were four main bureaux: intelligence, public relations, legal and finance. The most powerful of these was intelligence, and it was intelligence which waged a secret and vicious war on the "enemy."

38. GO intelligence, also known as "B-1" as it was Bureau One in the GO organization structure, contained two branches: Branch 1 was external, Branch 2 was internal security. Hubbard patterned B-1 after the system developed by Reinhard Gehlen, the World War II Nazi spy master. When I was the intelligence officer in the Port Captain's Office on board the Apollo in 1974 and 1975, I was for most purposes directly junior to Brian Roubinek, the Assistant Guardian for Intelligence (AGI) in the Flag GO. Roubinek brought on board with him the "Information Full Hat," the GO intelligence

training manual for B-1 personnel, and gave it to the Port Captain's Office for our training. Attached hereto as Exhibit T is a copy of the manual's "checksheet," which lists the policies to be studied and drills to be done as individual steps in the training. The use of "Information" for "Intelligence" is itself a shore story to cover what the intent and practices of B-1 actually were. The Policy Letter "Intelligence and Security" attached hereto as Exhibit U shows that "information" is "intelligence." The types of operations carried out by B-1 against Hubbard's perceived enemies and what I was instructed in by the AGI Flag, are shown by the report on "Successful and Unsuccessful Actions," attached hereto as Exhibit V, and also appearing on P. 6 of the manual, written by the Deputy Guardian for Intelligence at WW, Mo Budlong, to the Guardian, Jane Kember. Budlong was the head of the B-1 network under Kember. The report lists among the successful actions: using 2D on someone high in the government to seduce them over to our side (2D means sex); infiltrating an enemy group; covert third partying (meaning starting conflicts between individuals or groups with rumors, the source of which remains hidden); forgeries; direct theft of documents.

39. In addition to being the Controller, over top of the Guardian's Office, Mary Sue Hubbard was also referred to as Commodore's Staff Guardian (CSG) and had yet another official position, Deputy Commodore. As CSG, she was part of the

Commodore's Staff Aides, a group of approximately 10 executives who were the Commodore's, Hubbard's, personal staff, and were the senior management body under Hubbard in all Scientology. As CSG, Mrs. Hubbard also had the responsibility of coordinating GO and Sea Org actions. Any correspondence from anyone on the ship into the GO network, except directly to the Flag GO once it became established on board, had to be sent via Mrs. Hubbard by her order. As Deputy Commadore by policy she replaced Hubbard as head of the Sea Org whenever he was absent. At all times, however, up until her removal as Controller in 1981 due to her conviction and sentencing in the Federal criminal case brought against the hierarchy of the GO for burglarizing Federal agencies, theft and obstruction of justice, she was the second in command of all Scientology organizations, answerable only to L. Ron Hubbard.

40. There was not one activity in the Sea Org, or in Scientology organizations everywhere which Hubbard did not control. That is not to say that he cooked the meals or personally decided where each person slept, but could at any time he wished do these things, and these things and every detail of Sea Org life were done or established pursuant to his policies and orders. His control on board the "Apollo," and in the land bases he moved to after 1975 was effectuated on a direct, immediate and verbal basis via his messengers, the CMO. They ran between Hubbard and all other crew and students,

relaying his verbal orders and reporting back to him the recipients' answer or compliance. The CMO also took care of many of Hubbard's personal needs and desires, but their primary duty was running his verbal orders and getting compliance to them. The messengers acted as if they were Hubbard; they were trained to deliver his verbal messages exactly as he stated them, including with the identical intonation and emotion. Their orders could not be disobeyed. Non-compliance with any order was punished with at least a lower condition of "liability" with ten hours or more of "amends" work and no liberties. To get out of the condition of "liability" required petitioning each crew member individually and obtaining a majority approval. Usually, non-compliance with an LRH order was dealt with far more severely than this, and intentional non-compliance was almost unheard of. It was the duty of anyone receiving a verbal order from Hubbard, directly or via a messenger, to report the order in writing to the LRH Personal Communicator (LRH Pers Comm) who would record it in the log of Hubbard's orders he maintained and for which he also had a duty to enforce compliance. Written orders from Hubbard to anyone went via the LRH Pers Comm, not the messengers, at least until 1976 and in some matters thereafter, and these too were logged for compliance. The CMO maintained a separate "Messenger Log" which contained all Hubbard's orders handled by the messengers, as well as a record of when Hubbard worked, slept, ate, what activities he was involved in at any time, and what messengers

were on which watch. There were four six-hour messenger watches daily, and usually three messengers on each watch. They remained with Hubbard or within yelling range at all times, including waiting outside his quarters throughout the night as he slept until he called them when he waked.

41. His control of the various land based Scientology organizations and personnel was effectuated through the two major organizational arms: The GO and the Sea Org. The GO, which Hubbard controlled through Mary Sue Hubbard, both by his policies which governed its structure, planning and programming, and by his orders directing specific actions or operations, dealt with external matters, those areas or problems which potentially could prevent the non-GO Scientology service organizations from doing their jobs, which was selling auditing and courses and making money. The public groups the GO was responsible for included the press, government, legal and "opposition groups." The GO, by its mandate from Hubbard, called the "LRH Heavy Hussars Hat," could, however, move into and take over any part or function in any organization on a by-pass of the Sea Org executives normally in charge. The GO executed tremendous control throughout all of Scientology and was, until around 1981 the most powerful of Hubbard's two main control lines.

42. He effectuated control of the normal service

organization functions; that is, advertising, sales, auditing, courses and income-generating actions, through an elaborate heirarchical management system. Directly below Hubbard and forming part of his personal staff were the Commodore's Staff Aides, one assigned to each of the seven standard divisions in all Scientology service organizations. The CS Aides, including Mary Sue Hubbard as CSG, formed collectively the Aides Council which had a strategy coordination function under Hubbard. Beneath the CS Aides, and utilized by them and Hubbard in the management of all service organizations were the Flag Bureaux (FB). The FB originated and operated programs for each service org internationally. A program is a series of steps or targets, orders to be carried out by individuals named in the program as responsible for each target. The FB also briefed, fired and operated missions; that is, small groups of personnel sent on mission orders, which, like programs contained a series of targets, to perform a specific task and return to base. Another FB Unit was the External Communications Bureau which sent and received all telexes and written correspondence for the flagship, and all Scientology management. Telexes, which were always coded, and mail were sent and received daily. Beneath the FB organizationally during the 1970's were the Flag Operations Liaison Offices (FOLO's) one in each of the geographical areas in which there were Scientology service orgs. The FOLO's were manned by crew considered Flag staff, and had the responsibility, as the link between the FB and service

orgs, to relay communications and get Flag's programs executed.

43. Another channel by which Hubbard directly controlled Scientology orgs and activities was the LRH Communication (LRH Comm) network. An LRH Comm was posted in every organization or franchise internationally and were headed by the Flag LRH Comm (CS-7). The LRH Comm network was, similar to the GO, an "autonomous network," and the LRH Comm in any organization was not under the local organization executive director, but subject only to the orders of his network seniors. Every LRH Comm had as his duties to get compliance with Hubbard's orders, enforce Hubbard's policy letters, and to take whatever actions were necessary to carry out Hubbard's intention for the organization.

44. Hubbard had complete control of Scientology finances, both through his policies and directly. Anything he ordered be bought would be immediately on the basis of his "LRH order." He was the only person in the organization with that power. Anyone else needing to purchase anything to do his job had to get a purchase order approved in a budget by the Financial Planning (FP) Committee. The budget then had to be approved by the Treasury and Finance Bureau executives, and finally by Hubbard, if he chose to. Even on the flagship which was collecting money from all service organizations internationally and was holding millions in Sea Org reserve

W.D. { funds, Hubbard would at times initiate an austerity campaign and reduce allocation of many budget items. There were times the ship ran out of toilet paper, and other times when the Clearwater Flag Land Base (FLB) was set up he order that everyone eat only rice and beans. There were many times on the "Apollo" when just to be able to do my job I paid for my own transportation and bought customary gifts for officials in the ports out of my own pocket, even though I was being paid only ten dollars per week, because I could not get approval for these necessities in the FP budgets. Hubbard set crew "wages" and had wages docked if he considered someone was not performing well on post. While most crew were kept impoverished, and unable to buy clothes and the barest of necessities, Hubbard was fleecing the Scientology organizations of millions of dollars through a Liberian "desk drawer" corporation called Religious Research Foundation (RRF). Non-U.S. students and people coming for auditing to the Apollo, and later the FLB, paid their money for services purchased to RRF, not the Church of Scientology. These funds did not then show up in Scientology account books. Hubbard had complete control of RRF, and transferred millions to himself from this phony corporation. The money being taken in by RRF, which provided no service to anyone, should have been paid to the Church of Scientology of California, a U.S. corporation, which was claiming to the Internal Revenue Service during theis period that the flagship Apollo was its "marine mission."

N.B. 45. During this period, when millions of dollars of Scientology funds were inuring to Hubbard in fraudulent transactions from shell corporations, he was disseminating to staff and public paying customers a totally different picture, another shore story. In a promotional piece, entitled "What Your Fees Buy," attached hereto as Exhibit W, distributed widely and used by Scientology salesmen when selling auditing and courses, Hubbard wrote the bald-faced lie, "the fees you pay for service do not go to me." He stated, "I draw less than an org staff member" draws only about four pounds a week." (This is the \$10.00 per week we received on board.) He claimed that he was not even receiving royalties for his books. It was not until almost the end of my Scientology "career" that I learned that Hubbard's statements about his income from Scientology were lies, and that like thousands of other staff who had labored in disgraceful conditions for paupers' wages, which he set, I had been cruelly defrauded.

46. The disparity between the way Hubbard lived and was treated on board and the conditions and treatment of most of the crew was enormous. He had a spacious stateroom, as did Mary Sue Hubbard, a large auditing room, a sumptuous office, which was referred to as his "research room," and an enormous and elegant living and dining room. All these spaces were off-limits to crew and students. Hubbard had his own steward,

N.S.
cook, cleaners, and driver in addition to the messengers who catered to his every whim. Mrs. Hubbard had her own steward, as did the Hubbard children. The Hubbards ate separately from everyone else and ate different food prepared in their own galley by their own cook. Much of the Hubbard's food was flown in with couriers from the United States, whereas crew food was purchased locally. Some of the top executives among the crew shared small cabins and married couples generally had a cabin, but for those crew berthed in dormitories, the conditions were very bad. The dorms were cramped, bunks had been installed three high, there was virtually no room to store personal belongings, the ventilation was inadequate, the spaces smelled, and they were roach-infested. Much of the ship was roach-infested and despite attempts to get rid of them, including a "roach derby" initiated by Hubbard in which messengers fined any crew if roaches were found in their work or berthing spaces, the roach problem remained until we all moved ashore in the fall of 1975. In the last year or so of the Apollo's operation as the flagship, as the on-board complement grew and berthing space shrunk, due to the ever-expanding need for offices and work areas, many of the crew were forced to sleep above decks wherever they could find a spot. If it rained too hard they picked up their blankets and moved inside into crew dining rooms.

47. The demand for production and the threat of

punishment for low production were so great at all times that
much of the crew existed in a state of continual exhaustion.
For years, I averaged something like four hours of sleep a night
and many others had to work equally long hours. Although there
was an official schedule for crew, it was impossible to adhere
to it because of the work load imposed by Hubbard and senior
executives. As most of the crew could not afford decent
clothing, many worked in virtual rags. Clothes had to be washed
in buckets and there were no drying facilities aboard. Many
crew members did not care for themselves hygienically and body
odor, especially in the dormitories, was at times oppressive.
Because space was so limited and holds, which should have
contained crew baggage, had been turned into mimeograph, file
rooms, or RPF berthing, there were, except in the Hubbards'
areas, piles of clothing, personal belongings and junk all over
the ship. As I had the job of promoting the shore story to the
local people in the ports we visited; that is, that we were
Operation and Transport Corporation, a highly successful
business consultant firm with the world's most effective
management technology, the crew and ship appearance was a
continual problem and embarrassment to me.

48. Crew medical and dental needs were given a low
priority, far back of production and discipline. Unless crew
members were badly injured or seriously ill, they did not go to
the doctors. And if they developed a protracted illness, they

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were labelled "clinical," and usually offloaded. Individuals with cancer, even ulcers, both conditions which Hubbard claimed to be able to cure with Dianetics and Scientology auditing, were offloaded rather than treated. Crew who became sick and unable to work had their pay docked for whatever days they missed. Hubbard also railed against medical doctors in his writings, claiming that they destroyed lives, and had a vested interest in people getting ill, and this created an aversion in Scientologists, certainly in myself, to medicine. The Sea Org administrative procedures also made getting medical or dental treatment, difficult. It was hard to get off post for any reason, and even more difficult if one's statistics were down. Statistics, the record of the amount of production done, had to be maintained by each crew member, and "ethics conditions" were assigned on the basis of the person's statistics. The statistics had to keep going up or the person would get in "ethics" trouble. And with down statistics in a given week, it would be almost impossible to get off the ship. Also, to get medical or dental attention, unless it was an emergency, a crew member would have to petition his seniors for permission, and then would have to ensure there were sufficient funds allocated in the medical float. I personally was denied both medical and dental attention on separate occasions when I requested it while in the Sea Org and was told it was because there was not enough money.

49. Although the conditions aboard were so abominable they would shock any normal person's sensibilities, they remained that way because crew had no possibility of changing them. The conditions were set by Hubbard, and crew were kept from changing any of Hubbard's policies or orders by his system of discipline and punishment he called "ethics." The purpose of the Sea Org was stated officialy as "to get in ethics on the planet"; that is, to make the world a more ethical place. "Ethics" was ever-present in the Sea Org, as a common word, concept, department and force. "Ethics offenses" were met with "ethics penalties," which ranged from the "lower conditions," - "liability," "doubt," "enemy," "treason," "confusion," and "no condition" - each of which required many hours of "amends" labor be done while still maintaining one's own post production to a "suppressive person declare." The extent to which ethics penalties were taken is shown by the "Fair Game Policy," attached hereto as Exhibit X, which stated:

N.B.
"Enemy - SP (Suppressive Person) Order. Fair Game. May be deprived of property or injured by any means by any Scientologist without any discipline of the Scientologist. May be tricked, sued or lied to or destroyed."

Scientology has claimed that "Fair Game" was cancelled by the policy letter from Hubbard attached hereto as Exhibit Y. This policy states, however, that the use of the term was cancelled, but the "treatment or handling of an SP" was not. Complaining about a policy or conditons was an ethics offense. Crew and all

N.B. Scientologists were expected to report on one another, wife on husband and children on parents. anyone failing to report a violation of policy or even someone upset or unhappy would himself be punished. Hubbard created an atmosphere of distrust, fear and oppression among all staff. It was called "nattering" and was dealt with very severely. A person soon learned to not complain, and certainly to not question Hubbard's policy, because any counter-intention exhibited toward his policy was also a serious offense. In the Sea Org, what Hubbard called "ethics," was not ethics at all, but threat and terror to enforce blind obedience. And Hubbard, who was continually lying about his past, his accomplishments, his income, and what Scientology really did, was himself supremely unethical.

N.B. 50. He also used the auditing procedure, by which he claimed to be freeing people, to subtly program them to not even think a critical thought about the deplorable conditions in which he kept them. During any auditing therapy session, if the person undergoing the auditing, the preclear or "pc," makes any critical comment, the auditor will immediately demand of the preclear any overt, that is, any intentionally harmful act, he has committed. In Hubbard's system, any criticism meant that the person making it had a hidden undisclosed crime. One of his bulletins, "Session Must-nots," attached hereto as Exhibit Z, states this point:

"When the pc is critical of the auditor, the organization or any of the many things in life, this is always a symptom of overts priorly committed by the pc.

"This is a sweeping fully embrace statement - and a true one. There are no criticisms in the absence of overts committed earlier by the pc."

N.B. Very soon after some auditing in the Sea Org I learned that any criticism I had meant I had done something bad, and after a while, I even was stopped from thinking any thought critical of Hubbard or the organization. In Hubbard's dictionary of Scientology terms, a "critical thought" in fact is defined as "a symptom of an overt act having been committed." The page with this definition is attached as Exhibit AA. This concept, although programmed into people in auditing pervaded every part or aspect of the organization. So the criticisms of a crew member who complained of too little pay, bad living conditions, or harsh punishment were not listened to, but rather he would be investigated or sec checked for his "crimes." By contrast, however, it could never be thought that Hubbard, who was constantly critical of doctors, judges, scientists, psychologists, government, teachers, and especially Scientologists, and Sea Org members, had himself committed crimes or overtacts, because such a thought about him was clearly "critical." Thus, he achieved almost absolute mind control.

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51. He was, through the same mental manipulations and by bringing staff along through various levels of deception,

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able to get them to commit antisocial acts they never dreamed of when they entered Scientology. One of the most heinous activities of the organization is the use for intelligence, security and extortion purposes of the statements made by preclears to their auditors during the auditing process, in what the preclears think is complete confidence. Only in late 1975 did I learn of the practice. At that time, I was working in the Guardian's Office in Daytona Beach coding and decoding telexes. Every day there were telexes from GO's in organizations around the world to the Flag GO with information about individuals taken from their preclear folders. If I had known that information divulged in auditing was not confidential but would be freely viewed, excerpted, disseminated and used by the GO, I would never have gotten into Scientology. But I learned of the practice six years later, and by then made no choices for myself. Later still, when I was in the RPF, on orders from the GO, I personally participated in this practice, "culling" the pc files of people who requested to leave or whom the GO considered security risks. A person's pc file, or auditing file, contains everything the preclear says to his auditor during "therapy," taken down in note form longhand. It contains the preclear's whole life, especially the times of upset and emotional change. The GO ordered culled from the preclear's files any crimes, any sexual incidents, any drug history, and any embarrassing facts. For people who requested to leave the Sea Org, these things were typed into a "crimes list" which they had to sign before being

allowed to leave. I received similar orders to "cull" pc files from the CMO, both in Clearwater and in La Quinta, California. I know for a fact that my own preclear files have been culled by GO intelligence since I left the organization and I have attempted to get them returned to me. In an uthinkably preverse distortion of reality, Scientology claims these files are protected by the priest-penitent privilege and refuses to turn them over to the people whose statements they contain, and whose property they are. Yet, in that paradigm, the preclear is the "penitent" for whose protection the privilege exists. Scientology attempts to cover its crime by invoking the privilege it violates.

52. While admitting that preclear files are "confidential," Scientology has claimed that its use of information from "ethics" or personnel files, or from "life history" forms or written "confessions," called overt-withhold writeups or "O/W writeups," to attack people who have left the organization is justified because these files and forms are not "confidential." But that, too, is a distortion of the truth, because people are in fact led to believe these things, like the auditing information in preclear folders, are confidential. Nobody is told when getting into Scientology or the Sea Org that the forms they fill in and the papers in their files will be used against them in every way possible to destroy them if they ever discover they have been defrauded, leave the organization

or seek to obtain redress of wrongs done to them. In fact, people are led to believe these things will not be used in any way outside the organization, and certainly not to embarrass or harm them in any way. That staff would even fill out life history forms, which list sexual activities and partners, and drugs taken, or do "O/W writeups" of "crimes" committed or indiscretions of any kind, is a product of the twisted use to which "auditing" is put. Because a preclear divulges his innermost secrets to his "auditor" in the auditing process, which he is told is absolutely confidential, he becomes willing later to divulge the same "secrets" in other contexts within the organization; for example in "life history" forms or "O/W writeups." He is led along step by step with representations about the honesty, law-abiding nature, and benevolent intent of Hubbard and the organization to place more and more trust in them, trust which will be betrayed in an instant if it serves Hubbard's and the organization's true purposes: the amassing of power and wealth.

54. The betrayal of the trust placed in them and failure to deliver what they promised people is what has caused Hubbard and Scientology its many problems. It was not Hubbard's enemies; like all dictators, he invented his enemies to keep staff and followers in line and keep them from finding out they were being lied to. The betrayal of trust began with Hubbard's lies about himself to sell Scientology. It continued with the

failure of Scientology of live up to its promises made to paying customers. It did not cure arthritis, ulcers, cancer and a host of other illnesses as he claimed. Scientology people who have been "cleared" still get colds, contrary to his "scientific" claim. It did not raise IQ a point per hour of auditing. If it had, I would have an IQ somewhere over 1000. It did not increase ability. When I left the Sea Org, after twelve and a half years in Scientology, I was broke with no marketable skills. It did not give me emotional stability, security or confidence. The whole Scientology/Sea Org experience emotionally traumatized me. It consciously destroyed in me the human capacity to trust. The scientific guarantees and the scientific nature of Scientology, the way he represented it when luring me into the organization, were lies.

54. Hubbard's strategem to avoid legal responsibility for his fraudulent claims was to label Scientology a "religion." But that is just another shore story. The initial representations by Scientology salesmen are that it is a "science." The literature is full of such statements. And the promises of what Scientology will do for a customer are stated as "scientifically guaranteed," and are in any case secular representations - such things as increased IQ and ability, improved appearance, curing colds, allergies, headaches, cancer, etc. Staff and customers are told that the religious cover is needed as a defense against Scientology's "enemies."

Scientology is in fact, in its top structure, represented as antithetical to religion, which is considered a humanoid aberration, an insanity. Hubbard's intent in labelling his "science," Scientology, a "religion," can be seen in his letter of April 10, 1953, attached hereto as Exhibit BB, to Helen O'Brien, the head of Scientology in the U.S. at the time. Hubbard writes about the creation of an auditing clinic connected to the HAS, the Hubbard Association of Scientologists, the early Scientology company:

N.B. { "We don't want a clinic. We want one in operation but not in name. Perhaps we could call it a Spiritual Guidance Center. Think up its name, will you. And we could put in nice desks and our boys in neat blue with diplomas on the walls and 1. knock psychotherapy into history and 2. make enough money to shine up my operating scope and 3. keep the HAS solvent. It is a problem in practical business. I await your reaction on the religion angle. In my opinion, we couldn't get worse public opinion than we have had or have less customers with what we've got to sell."

55. I first met Tonja Burden on the Apollo in 1974. She was a little girl then, maybe thirteen or fourteen years of age, and inexperienced, even for that age. She worked in the CMO on the ship, in the CMO Estates Project Force (EPF), the group which did cleaning and other menial tasks, and as a junior watch messenger, running messages for Hubbard and carrying out all his wishes, under the supervision of more senior messengers. Most of the direct contact I had at that time with Tonja was when she cleaned my cabin. I was then married to

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Terri Gillham who was the head of the CMO, and EPF personnel cleaned the senior messengers' rooms. Although I did not know Tonja's exact schedule on the ship, I sometimes observed that she appeared exhausted from lack of sleep. My main impression from that period was that she was terribly overwhelmed and the flippant attitude she sometimes projected was just to cover up the overwhelms. At times, tear would well up in her eyes when things were particularly stressful for her, and she seemed unable to communicate her thoughts at those times. I would not have pressed her to communicate in any case, because emotional problems were left to auditing, and it was unacceptable to sympathize with someone in trouble.

56. When Hubbard's personal staff moved to Dunedin, Florida, I became the Deputy LRH External Communications Aids, and several of the messengers including Tonja worked with me in the LRH External Comm (LEC) Unit. Hubbard created a new shore story for the Florida operation. The properties in Clearwater were purchased by a front corporation, Southern Land Development and Leasing Corporation, and then leased to another phony organization called United Churches of Florida. The Dunedin operation was to be United Churches Extension (UCE). As with the OTC shore story, we were to deny being Scientologists or any connection between United Churches and Scientology. We were to maintain the same level of security as on the ship. Scientology terms were never to be used outdoors and Hubbard was to be

referred to, even in phone conversations only as "the boss." Generally Tonja worked on telexes in LEC, coding, typing, transmitting, receiving, decoding and distributing them to personnel at UCE. Almost all the telexes were originated by or addressed to Hubbard or his wife, who had her Controller's office and staff at UCE as well. At times, Tonja also worked in the mail unit, collecting, logging and packaging the outgoing mail, and unlogging and distributing incoming mail. There were generally three mail and telex runs daily. Hubbard operated all of Scientology internationally from UCE although he concentrated during that period on the setup and operation of the new Flag Land Base in Clearwater, Florida. He operated dozens of missions covering every aspect of the base establishment, including operating on a direct basis all GO activities in Clearwater. At least twice he had the GO executives over to UCE to personally brief them on what he wanted. I do not recall all of the mail and telex traffic I saw for Hubbard during that period as there was such an enormous quantity. Among the operations I do recall, however, were "Program LRH Security - Code Name: Power," which, along with an accompanying letter from Hubbard, and a compliance to "Power," a GO project called "Early Warning System: B-1" is attached hereto as Exhibit CC, and "Operation Goldmine" written by Hubbard, a response to which from the USGO is attached hereto as Exhibit DD. A program folder was maintained for both "Power" and "Goldmine" on LEC, in addition to several other programs Hubbard operated. The "Early

N.B. Warning System" GO project, in order to obtain prediction of any attempt to serve Hubbard with a subpoena, ordered the infiltration of the US Attorney's Office in Washington, DC and Los Angeles, the Internal Revenue Service, the District Attorney in Los Angeles, the Attorney General of California, the American Medical Association, the Florida State Attorney General's Office, the local District Attorney's Office, and the local U.S. Marshal's office; and the theft of documents from Federal offices. I was instructed at UCE that if a process server arrived to serve Hubbard, he was to be alerted and the process server physically blocked so that Hubbard could make a getaway. The "Goldmine" report reveals the Scientology corporate machinations being ordered by Hubbard, and that there was, in fact, no corporate integrity.

57. Sometime in February 1976, when the United Churches cover was "blown" in Clearwater, and it was revealed that the whole operation was Scientology, Hubbard fled from Dunedin and went into hiding in Washington, DC. His telexes and mail continued to go via UCE, however, to create the illusion, even to staff in Clearwater that he still was there. From UCE, we relayed them on GO mail lines to the Washington, DC Scientology organization where he had two messengers working in the local GO to handle his mail and telex traffic. Tonja stayed behind and continued to work in LEC with me. I became, along with my wife, Terri, her "guardian" around that time, a

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requirement set by the GO to protect the organization from liability for the children living at the base without their parents. It was not a legal guardianship, and it was meaningless in any case as the conditions were set by Hubbard, and no one had any power to change them. AT UCE, as on the ship, Tonja seemed confused about all that was going on, teary-eyed at times, and constantly overwhelmed. I know she was not attending school, and was not being given anything remotely resembling a normal education.

58. In May 1976, was sent to Los Angeles on a mission to set up an LRH External Communications Unit for Hubbard, there, and did not see Tonja until I was returned to Clearwater and assigned to the Rehabilitation Project Force (RPF) in July. And at that time, I could not talk with her because I was an RPF member, and talking to non-RPF crew was forbidden. Hubbard created the RPF on board the ship in January 1974. It was essentially a prison to which crew who were considered non-producers, security risks, or just wanted to leave the Sea Org, were assigned. Hubbard's RPF policies established the conditions. RPF members were segregated and not allowed to communicate to anyone else. They had their own spaces and were not allowed in normal crew areas of the ship. They ate after normal crew had eaten, and only whatever was left over from the crew meal. Their berthing was the worst on board, in a roach-infested, filthy and unventilated cargo hold. They wore

black boilersuits, even in the hottest weather. They were required to run everywhere. Discipline was harsh and bizare, with running laps of the ship assigned for the slightest infraction like failing to address a senior with "Sir." Work was hard and the schedule rigid with seven hours sleep time from lights out to lights on, short meal breaks, no liberites and no free time. They followed a prescribed program of sec checks and ethics penalties. It took months for RPFers to get through the program, to graduate back into crew status. Hubbard used the RPF as threat to enforce obedience on the ship and throughout the Sea Org. He threatened me with assignment a number of times. The RPF was a degrading experience and the possibility of assignment terrifying. When one young woman ordered into the RPF took the assigment too lightly, Hubbard created the RPF's RPF and assigned her to it, an even more degrading experience, cut off even from the RPF, kept under guard, forced to clean the ship's bilges, and allowed even less sleep. Finally, on July 1, 1976, in Clearwater after having me locked up for three weeks in Los Angeles, Hubbard carried out his old threat and assigned me to the new land base RPF. I stayed there seventeen months, finally getting out on December 1, 1977.

59. Around September 1977, Tonja was assigned to the RPF, so I had quite a bit of contact with her again. I had had no contact with her since my assignment because it was a serious offense to talk to any non-RPF peronnel. I did not even know

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what had happened regarding my quasi-guardian relationship to her. By the time Tonja was assigned I was the head of the RPF on the inside, and Tonja became my junior. An RPF assignment was an unbelievably traumatic experience. When it happened to me, and I was a grown man, I was so devastated that I went into shock that lasted several days, during which time I could eat hardly anything. It was one of only three times I cried during all my time in the Sea Org, and I was in such heavy grief, my body convulsed uncontrollably. Tonja too, would sink into deep grief in the RPF, and there were other times it seemed to me she was suppressing the overwhelming sadness inside her. There is no way to really describe the RPF experience, the hopelessness, the humiliation, the horror. It seemed to go on forever, the days all identical, no time to oneself, the same blue boiler suits like prison garb day after day, the same questions in endless sec checks. I was a fairly intelligent, somewhat educated adult, already trained to a degree as an auditor, with seven years experience in Scientology, and it took me seventeen months to make my way through the RPF program. For Tonja, a little girl, uneducated, unsophisticated, innocent, and completely untrained as an auditor, it would have taken years. In spite of the hopelessness of her situation, and the oppressive nature of the RPF program, I never saw Tonja quit, or even quit working, and I never saw her become bitter or antagonistic. She remained a decent, albeit broken, young lady. Hubbard's purpose in creating the RPF, and running it as

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a prison with the assignees considered criminals, was the breaking of people's wills, the total subjugation of anyone he considered exhibited "counterintention" to his goals. He achieved his purpose with me so well that I thanked him for the opportunity of doing the RPF, much like prisoners of war who are broken emotionally and spiritually in prison through deprivation and mind control techniques thank their captors. Attached hereto as Exhibit EE is a "success story" I wrote when getting out of the RPF, the last requirement before graduating. Evidencing my debased state at the time I thanked Hubbard for giving me my sanity, when in fact, he had done everything he could to take it from me.

60. A week or so after my graduation from the RPF I was transferred with my wife Terri to the CMO office in the Sea Org "Cedars" complex in Los Angeles. A few days later we received a telex from the Clearwater CMO Unit stating that Tonja had fled from the RPF and gone to Las Vegas, Nevada. Terri and I were ordered to get her back. We drove to Las Vegas and found Tonja at her parents' home. She was shocked that we had tracked her down so quickly and she was terrified by us. Terri had been her senior for some years in the CMO, and I had been her senior at UCE and in the RPF, and we both intimidated her. She stated over and over that she did not want to go back. Tears welled up in her eyes. But Terri and I would not be swayed from our purpose. We talked to her mother and father, and intimidated

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them with veiled threats of what might happen, how it would be better for all if Tonja came back. We also insisted that Tonja's coming back and "routing out" properly was the most ethical thing for her to do. The truth was our purpose was to get Tonja back, have her sec checked and get her to sign waivers, releases and promissory notes, so she would be rendered harmless to Hubbard and the organization. Tonja was, in fact, considered a significant threat because she had worked so closely with Hubbard and potentially knew a great deal about his control of the organization, and GO intelligence operations. After several hours, and still against her will, Tonja succumbed to our tactics, and we drove with her to Los Angeles. There we turned her over to the Los Angeles RPF where she would be sec checked and made to sign the required documents.

61. In 1980, I was interviewed by the GO about Tonja, who was by then considered a major enemy of Scientology, and who I knew had been a factor in Hubbard's going into deep hiding at that time. An "affidavit," attached hereto as Exhibit FF, was typed up by the GO, and I signed it. It is in part false, and the overall picture it conveys is nothing like reality. Such false statements were expected of all Sea Org staff; they were just more "shore stories" or "acceptable truths," necessary to combat the "enemy." An example of an "acceptable truth" is contained in par. 5 of the "affidavit." People were assigned a condition of "treason" or said to be "in treason." But because

the exact word "treasonous," which Tonja used, was not a label generally attached to people in the RPF, I could write what I did to make Tonja look like a liar. My denial of the E-Meter being a lie detector, and the GO's description of it as a religious artifact in par. 11 is a shore story, and in fact, an outright lie. Even in Hubbard's own policy, attached hereto as Exhibit GG, he states that the "E-Meter is better known as a lie-detector." The statement in par. 12 that "if any individual desired to leave the RPF they were free to do so" is also a perversion of the truth. People could leave, but not without first being subjected to long sec checks, kept under guard, forced to sign waivers, releases, promissory notes and confessions of "crimes" excerpted from their auditing files, segregated, humiliated, and generally terrorized so they would be no threat after leaving.

62. What I did to Tonja, coercing her back to Los Angeles to subject her to sec checks and force her to sign documents, and signing myself a false statement against her was cruel and shameful. It shows the desensitization which had occurred to me over the years of oppression under Hubbard. Tonja was a young, innocent girl, herself brutalized by Hubbard and his organization, yet I perceived her as a "suppressive person," and "Fair Game," and any act against her, any trick, any lie, anything to destroy her, as laudable. It was only after studying the facts of Hubbard's life revealed in the

documents I assembled in the biography archives that I realized what Hubbard had done to me. And then, like Tonja, because of what I knew, I became "Fair Game." Since leaving the Sea Org, I have been sued by Scientology, assaulted by a private investigator hired by them, run into bodily by a car driven by another private investigator, an attempt was made to involve me in a freeway "accident," I was followed and harassed day and night for over a month, four attempts have been made to bring false criminal charges against me, my marriage has been destroyed, my best friend was used to set me up in intelligence operation, false "sworn" statements have been made against me by Scientologists and Scientology lawyers, and my life has virtually been destroyed.

Signed under the pains and penalties of perjury this
19th day of March, 1986.


Gerald Armstrong

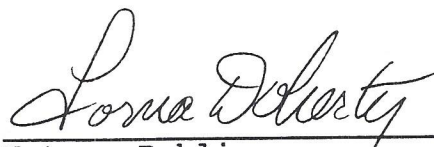
COMMONWEALTH OF MASSACHUSETTS

Suffolk, ss.

March 19, 1986

Then personally appeared before me the above named
GERALD ARMSTRONG and acknowledged the foregoing instrument to be
his free act and deed.

Before me,


Notary Public

My Commission Expires: 3/31/89